

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

The Estate of RICHIE MAJORS, deceased;
and RE'SHANE LONZO in her capacity as
the Personal Representative of the Estate of
Richie Majors,

Plaintiffs,

v.

Hon. Mark A. Goldsmith
Mag. David R. Grand
Case No. 2:16-cv-13672

ROGER A. GERLACH, et al.

Defendants.

PROPOSED JUROR VOIR DIRE

The Parties, through their counsel, submit the following Proposed
Juror

Voir Dire:

1. Can you please tell us your full name?
2. What is your level of education?
3. Are you employed? If, so what is your occupation? If
you are retire, what was your former occupation?
4. What is your marital status? Do you have any
children? If so, how many?
5. Do you have any military service? If so, what was your
rank at discharge?

6. Have you or anyone close to you ever been in jail or prison? If so, who and will that affect your ability to serve as a fair and impartial juror?

7. Have you or anyone close to you ever been employed or offered services in a jail or prison?

8. Have you ever served on a jury? If so, when? Was it a criminal or civil case? Did the jury reach a verdict in that case?

9. Do you have any positive or negative feelings about correction officers, law enforcement officers or the Michigan Department of Corrections or their contractors? If so, will that affect your ability to be a fair and impartial juror?

10. Do you have any knowledge or opinions about the operation of jails or prisons in Michigan? If so, what is the basis of your knowledge? Will that knowledge or opinion affect your ability to serve as a fair and impartial juror? What is your overall impression of the jail or prison system in America? Michigan?

11.

12. Do you have any medical education? Please describe your level of medical knowledge?

13. Do you have any nursing education?

14. Do you have any legal education?

15. Do you or anyone close to you have multiple sclerosis?

a. If so, whom?

b. What is their relation to you?

c. What was the result?

16. Have you or anyone close to you ever have a less than satisfactory experience or been dissatisfied with a healthcare provider? Have you ever filed a lawsuit alleging medical malpractice?

17. Have you ever been a party to a lawsuit?

18. Have you ever heard of this case or the Plaintiff?

19. Are you familiar with any of the following individuals who may be called as witnesses during this trial:

A. Re'Sahen Lonzo

B. Thomas Lanore

C. Sevithri Kakani

20. Are you familiar with attorney, Solomon Radner?

21. Are you familiar with attorney, Ron Chapman or Devlin Scarber?

22. Do you have a condition, medical or otherwise, that would make it difficult for you to sit through a trial?

23. If this trial lasted 4-5 days. Would that pose a hardship to you? Is there anything about your current situation that would make it difficult for you to sit through a trial?

24. Will you have any difficulty in putting sympathy aside and judging this case fairly and objectively?

25. Does anyone feel that because a lawsuit was filed, there must be some liability on the part of someone?

26. Will all of you be able to award damages to a plaintiff, even if the plaintiff is deceased?

27. Will all of you be able to award damages to a plaintiff who was formerly a prison inmate?

28. Have you or a close friend or relative ever worked in law enforcement or corrections?

a. If so, whom?

b. What is their relation to you?

c. Job title?

d. Dates of employment in the field?

29. Have you or a close friend or relative ever worked in health care?

a. If so, whom?

b. What is their relation to you?

c. Job title?

30. Have you or a close relative ever filed a lawsuit?

a. Nature of suit?

b. Medical malpractice?

c. Civil rights?

31. Have you ever testified at a trial, deposition, grand jury, or been called as a “witness” in any capacity during any proceeding?

a. Type of proceeding?

b. Which party did you testify for?

32. Have you ever been the victim of a crime?

a. Type of Crime?

b. When?

33. Have you ever had an interest in working in law, law enforcement, corrections, security, or the military?

34. Which news station do you prefer? (Fox, CNN, HLN, MSNBC, CBS)

35. Do you use social media? If so, which do you use; Facebook, LinkedIn, Twitter, Instagram, Google Plus, etc.?

36. Please describe your level of medical knowledge.

37. Have you ever been in a management position?

38. Have you ever been treated in an Emergency Room or Hospital?

a. For what reason did you seek treatment?

b. When?

39. Have you, a family member, or a close personal relative, as part of seeing a medical provider, ever been asked to provide a medical history to the medical provider?

a. If so, whom?

b. What is their relation to you?

c. Were you (or they) honest in reporting the medical history?

d. Do you believe that it is important for you to be honest about providing a medical history?

40. Have you, a family member, or a close personal relative ever been given medical advice or medical instructions by a health care provider?

a. If so, whom?

b. What is their relation to you?

c. Did you (or they) follow the medical advice or medical instructions?

d. Do you (or they) believe that following medical advice or medical instructions is important? Why or why not?

41. What are your feelings about lawsuits against medical professionals in general?

42. What is your opinion of jail or prison healthcare and access to healthcare in America? Michigan?

43. Do you understand that the Plaintiff has the burden of proof? This means that if Plaintiff fails to prove his case, you are required to find in favor of the Defendants.